

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

DRIVERDO, LLC, d/b/a DRAIVER,

Plaintiff,

v.

SOCIAL AUTO TRANSPORT, INC.,

d/b/a HOPDRIVE,

Defendant.

Civil Action No. 3:23-cv-00265-MHL

**CONSENT MOTION TO EXTEND DEADLINE TO FILE RESPONSIVE PLEADINGS
TO DRIVERDO, LLC’S COMPLAINT**

Defendant Social Auto Transport, Inc., d/b/a HopDrive (“HopDrive”), by and through undersigned counsel, hereby files this motion pursuant to Fed. R. Civ. P. 6(b)(1)(a) for an extension of time of the deadline to file responsive pleadings to Plaintiff DriverDo, LLC, d/b/a Draiver’s (“Draiver”) Complaint for patent infringement and states the following in support thereof:

1. Plaintiff’s Complaint was filed on April 20, 2023. HopDrive was served on April 26, 2023. As such, HopDrive’s responsive pleadings to the Complaint are due on May 17, 2023, and the deadline has not yet passed.

2. Defendant hereby requests that this Court extend the deadline for HopDrive to file responsive pleadings by thirty days, up to and including June 16, 2023, as HopDrive is in the process of investigating the Complaint and needs more time, given the complexity of the allegations and the fact that there are six patents asserted and potentially dozens of asserted claims.

3. HopDrive does not request this extension for the purpose of delay. This extension will not affect or delay other deadlines in this matter.

4. Additionally, Plaintiff consents to this request for an extension, through counsel, so no party will be prejudiced by the requested relief sought.

WHEREFORE, Defendant HopDrive respectfully requests that this Motion be granted and that the Court enter the attached Proposed Order.

This 5th day of May, 2023.

SOCIAL AUTO TRANSPORT, INC. D/B/A
HOPDRIVE

By: /s/ William R. Poynter

William R. Poynter (VSB No. 48672)
KALEO LEGAL
4456 Corporation Lane, Suite 135
Virginia Beach, Virginia 23462
Telephone: (757) 238-6383
Facsimile: (757) 304-6175
wpoynter@kaleolegal.com

CERTIFICATE OF SERVICE

I hereby certify that, on May 5, 2023, I electronically filed the foregoing with the Clerk of the Court for the Eastern District of Virginia using the CM/ECF system that will send notification of such filing to the following:

Rowland Braxton Hill, IV, Esq.
MerrittHill, PLLC
919 East Main Street
Suite 1000
Richmond, VA 23219
Phone: 804-916-1602
bhill@merrittfirm.com

/s/ William R. Poynter

William R. Poynter (VSB No. 48672)
KALEO LEGAL
4456 Corporation Lane, Suite 135
Virginia Beach, Virginia 23462
Telephone: (757) 238-6383
Facsimile: (757) 304-6175
wpoynter@kaleolegal.com